

**UNITED STATES DISTRICT COURT  
DISTRICT OF MARYLAND  
NORTHERN DIVISION**

IN THE MATTER OF THE PETITION

of

GRACE OCEAN PRIVATE LIMITED, as  
Owner of the M/V DALI,

and

SYNERGY MARINE PTE LTD, as Manager  
of the M/V DALI,

for Exoneration from or Limitation of Liability.

Docket No. JKB 24-cv-941

**IN ADMIRALTY**

**STIPULATION EXTENDING THE TIME FOR CERTAIN CARGO  
INTERESTS TO FILE CLAIMS IN THIS PROCEEDING**

**WHEREAS** W. E. COX CLAIMS GROUP (USA) LLC and W K WEBSTER & CO. LTD, as agents and trustees acting on behalf of various Cargo Interests moved the Court on September 23, 2024, for an Order extending the date by which a certain class of interests, specifically those parties with ownership, title and/or insurable interests in containerized cargoes carried on board the M/V DALI (“the Vessel”) when the Vessel departed her berth at the Seagirt marine terminal on or about March 26, 2024, to submit claims in response to the Petition for Exoneration from and/or Limitation of Liability of Petitioners (“the Motion”);

**WHEREAS** the Court issued an Order on September 23, 2024, granting the Motion in part, and denying the Motion in part, and setting down the matter for a hearing on October 1, 2024;

**WHEREAS** the Court heard argument on the Motion on October 1, 2024, and issued certain directions to the Parties;

**IT IS HEREBY STIPULATED AND AGREED** among the undersigned counsel that the Motion is resolved on consent as follows:

1. The Motion and this Stipulation pertain to claims and/or potential claims that are being or may be submitted on behalf of Certain Cargo Interests set out in Schedule A attached hereto, including empty container “shells” insured by certain of the Cargo Interests;

2. For those cargoes and empty container shells about which Cargo Interests currently have sufficient information of the nature of their damaged condition to file claims for physical loss or damage as a consequence of the Casualty described in the Limitation Petition in this matter, Counsel for Cargo Interests will file an Answer to the Limitation Petition with any counterclaims on or before October 9, 2024;

3. Cargo Interests must file an Answer to the Limitation Petition with any counterclaims for any remaining cargoes or empty container shells listed in the Appendices hereto on or before November 22, 2024;

4. The Cargo Interests set out in Schedule A will be bound by all Court orders—including dates and deadlines—issued from the inception of this case, and any objections to any prior activity in this case are deemed waived, notwithstanding that said Cargo Interests may not yet formally be party to this Limitation Proceeding;

5. The Cargo Interests set out in Schedule A will be bound by all discovery undertaken in this case as if they had answered the Limitation Petition on or before September 24, 2024, and none of said Cargo Interests will be heard to object to any discovery sought or

conducted on the basis that such discovery was sought or conducted prior to their filing an answer to the Limitation Petition.

6. The Parties reserve all other rights, defense, and remedies arising from or as a consequence of the Casualty described in the Limitation Petition, and this Stipulation is without prejudice to all such rights not specifically addressed herein.

Respectfully submitted this 9<sup>th</sup> day of October, 2024.

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**Certificate of Service**

I hereby certify that on the 9<sup>th</sup> day of October, 2024, I uploaded the foregoing and any attachments/exhibits to the Court's CM/ECF system for filing and service on all interested parties.

/s/ Terry L. Goddard Jr.  
Terry L. Goddard Jr.